Frank Field
Education Trust

# Privacy notice for Applicants and Staff

**Policy Information:**

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**Approved by CEO:**

Cath Green

**Approved by Chair of Board:**

David Wooff

Frank Field
Education Trust

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## 1. About this notice

This privacy notice explains how and why Frank Field Education Trust ("the Trust," "we," "us") collects and uses personal information about job applicants, employees, workers, agency and supply staff, apprentices, trainees, volunteers, consultants, contractors, trustees, and other office holders. It describes the information used, where it comes from, the purposes and lawful bases, recipients, retention, international transfers, and information rights. It should be read with any just-in-time notice supplied for a particular service or activity.

The Trust is the controller because it decides the purposes and means of the processing described here. This notice does not create contractual rights and does not prevent the Trust from processing information where the law requires or permits it.

## 2. Contact details

Frank Field Education Trust can be contacted at 164 Whitby Road, Ellesmere Port, Cheshire CH65 6EA, by telephone on 0151 318 9700 or by email at info@ffet.co.uk . The Trust's ICO registration number is ZA590527.

The Data Protection Officer is Matthew Keeffe of Keeffe and Associates Ltd. The Data Protection Officer may be contacted through info@ffet.co.uk or 0151 318 9700. The Data Protection Officer advises and monitors compliance, but operational decisions remain with the Trust.

## 3. Data protection framework

The principal legislation is the UK General Data Protection Regulation and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. The 2025 Act amends rather than replaces the existing framework. The Trust also applies the Privacy and Electronic Communications Regulations 2003 where electronic marketing or storage and access technologies are used.

Processing must be lawful, fair, and transparent; limited to specified purposes; adequate, relevant, and limited to what is necessary; accurate; kept no longer than necessary; and protected by appropriate security. The Trust is responsible for demonstrating compliance.

## 4. Information collected and sources

The detailed categories and sources are set out in Schedule 1. Information is obtained directly from the individual and may also come from referees, former employers, recruitment agencies, professional bodies, the Disclosure and Barring Service, government bodies, occupational health and medical advisers, pension and benefits providers, training providers, managers, colleagues, witnesses, publicly available professional sources, safeguarding partners and use of Trust premises, systems and equipment.

## 5. Why the Trust uses workforce information

The Trust uses workforce information to:

- recruit and appoint suitable people and complete safer recruitment checks;
- establish, manage, and end employment or engagement;
- pay salary, expenses, tax, pension and benefits;
- manage attendance, leave, working time, training, appraisal, capability, and workforce

planning;
- meet safeguarding, equality, health and safety, immigration, taxation, pension, education,
- and employment duties;
- support occupational health, reasonable adjustments, and emergency response;
- manage grievances, disciplinary matters, whistleblowing, allegations, complaints,
- investigations and legal claims;
- secure premises, systems, devices, accounts and information;
- complete School Workforce Census and other required education returns; and
- produce anonymised or aggregated management information and statistics.

## 6. Lawful bases

Schedule 2 maps purposes to lawful bases. The Trust principally relies on Article 6(1)(b) for steps at an applicant's request and employment contracts; Article 6(1)(c) for legal obligations; Article 6(1)(e) for education, safeguarding and other public functions; Article 6(1)(d) for genuine emergencies; and Article 6(1)(f) for carefully assessed interests that are not part of the Trust's public tasks, such as certain fraud prevention, network security or reference activities. Where legitimate interests are used, the Trust records the interest and balancing assessment. Consent is reserved for genuinely optional activity and is not used where the individual has no real choice.

## 7. Required information, monitoring, and recruitment searches

Information needed for eligibility, safer recruitment, right to work, contractual administration, payroll, safeguarding, or legal compliance must be provided. Without it, the Trust may be unable to progress an application, make or maintain an appointment, pay the individual, or meet a legal duty. Optional information will be identified.

The Trust may conduct a proportionate search of publicly available online information about shortlisted candidates as part of safer recruitment due diligence, where candidates have been told this may occur. Any issue will be considered in context and ordinarily explored with the candidate. The Trust will not seek access to restricted social media accounts or use protected characteristics or irrelevant private information in selection.

Trust systems, networks, premises, accounts, and devices may be filtered, logged, monitored, retrieved, or audited for safeguarding, security, legal compliance, service management, and investigation. Monitoring must be lawful, transparent, necessary, and proportionate and is further addressed in the ICT Acceptable Use, Surveillance and CCTV, and relevant staff privacy information.

## 8. Special category and criminal offence information

Special category information includes information about health, disability, racial or ethnic origin, religious or philosophical beliefs, trade union membership, political opinions, genetic or biometric identification, sex life, and sexual orientation. The Trust will identify both an Article 6 lawful basis and an Article 9 condition. Where required, it will also identify a Data Protection Act 2018 Schedule 1 condition and comply with its Appropriate Policy Document.

Criminal allegation, conviction, offence, barred list, and related information is processed only under Article 10 were authorised by domestic law, including an applicable Data Protection Act 2018 condition. A DBS check or disclosure is requested only where the role or activity is eligible and the information is necessary.

## 9. Data sharing and processors

The Trust does not need consent every time information is shared. Sharing takes place where there is a lawful basis and is necessary, proportionate, and secure. Before a non-

routine disclosure, the Trust considers the recipient, purpose, authority, accuracy, data minimisation, confidentiality, and secure transfer. Safeguarding information is shared in accordance with safeguarding law and guidance.

A processor handles information only on the Trust's documented instructions under a written contract containing the terms required by data protection law. Some recipients, including the Department for Education, local authorities, police, regulators, pension schemes and health bodies, may be separate controllers for their own statutory functions.

## 10. International transfers

Some approved service providers may store or access information outside the United Kingdom. Before a restricted transfer, the Trust will ensure that an adequacy regulation, the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses, or another lawful transfer mechanism or exception applies. The Trust will assess the transfer and apply supplementary measures where required.

## 11. Security

The Trust applies role-based access, authentication, secure configuration, backup, audit, training, contractual controls, and incident-management arrangements appropriate to the risk. Information received or sent in error must be reported immediately. No security measure can eliminate all risk, but the Trust is required to use measures appropriate to the likelihood and severity of harm.

## 12. Retention

Workforce information is retained under the Trust's Records Management and Retention Schedules Policy. Different periods apply to recruitment, personnel, payroll, pensions, safeguarding, health and safety, DBS, training, grievance, disciplinary, litigation, and governance records. Unsuccessful applicant records are retained only for the approved recruitment period unless a legal hold applies or the applicant has freely agreed to future vacancy consideration.

Routine disposal may be suspended where information is subject to a safeguarding, audit, complaint, investigation, litigation, or other preservation hold. At the end of the approved period, information is securely deleted, anonymised, transferred or preserved for archival purposes were lawful.

## 13. Information rights

Depending on the processing and lawful basis, individuals may have the right to be informed; obtain access and a copy; correct inaccurate information; complete incomplete information; request erasure; request restriction; object to processing; receive certain information in a portable format; and withdraw consent where consent is used. Rights are not absolute. The Trust will explain any lawful restriction or refusal and the right to complain.

A request can be made verbally or in writing. The Trust may ask for proportionate evidence of identity and authority. It will normally respond within one month, subject to lawful extensions. Information about another person may be withheld or redacted where their rights or another legal duty requires this.

## 14. Automated decision-making

The Trust does not routinely make decisions producing legal or similarly significant effects solely by automated means. If such processing is introduced, the Trust will identify a valid lawful basis, provide meaningful information about the logic and likely consequences, and implement safeguards including the ability to make representations, obtain human

intervention and challenge the decision. Additional restrictions apply where special category information is involved.

### 15. Data protection complaints

A data protection complaint may be made to the Trust by email, telephone or post using the contact details in section 2. The Trust will make an accessible complaints route available, acknowledge the complaint within 30 days, take appropriate steps to investigate and respond without undue delay, keep the complainant informed and communicate the outcome.

A complaint may also be made to the Information Commissioner's Office through its website, on 0303 123 1113, or at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. The ICO would normally expect the concern to have been raised with the Trust first.

### 16. Changes to this notice

This notice is reviewed at least annually and whenever processing changes materially. Where a new use is not reasonably compatible with the original purpose, the Trust will identify a lawful basis and provide fresh privacy information before the new processing begins unless a lawful exception applies.

## Schedule 1: Categories and sources of workforce information

| Purpose | Information used and source | Lawful basis and additional condition |
|---|---|---|
| Identity and contact | Names, addresses, personal and work contact details, date of birth, photograph, signatures, emergency contacts | Individual; emergency contact; manager; agency |
| Recruitment and eligibility | Application, CV, employment history, references, qualifications, registration, right to work, interview and online-search records | Individual; referees; former employers; agencies; public professional sources |
| Contract and pay | Role, contract, hours, location, salary, tax, NI number, pension, bank, expenses, and benefits | Individual; Trust; HMRC; pension and benefit providers |
| Attendance and development | Working time, leave, absence, training, appraisal, capability, promotion, and succession information | Individual; managers; training providers; Trust systems |
| Health and adjustments | Health, disability, occupational health, sickness, accident, adjustment, and emergency information | Individual; occupational health; health professionals; managers |
| Equality information | Age, sex, ethnicity, religion or belief, disability, sexual orientation, and trade union membership were collected | Individual; HR records |
| Safeguarding and criminal data | DBS, barred-list, prohibition, allegations, convictions, and offences where lawful | Individual; DBS; professional bodies; police; safeguarding partners |
| Conduct and legal matters | Grievance, disciplinary, whistleblowing, complaint, investigation, tribunal, and claim information | Individual; witnesses; managers; advisers; public bodies |
| Systems and security | CCTV, access logs, devices, accounts, IP addresses, audit logs, communications metadata, and security events | Trust systems; approved suppliers; CCTV and access systems |

## Schedule 2: Purposes and lawful bases

| Purpose | Information used and source | Lawful basis and additional condition |
|---|---|---|
| Recruitment, appointment, and safer recruitment | Application, identity, eligibility, references, qualifications, DBS, and professional checks | Articles 6(1)(b), (c) and (e). Articles 9(2)(b), (g) or (h) where applicable. Article 10 and DPA 2018 authority for criminal data. |
| Employment administration and pay | Contract, working time, salary, tax, pension, leave, and benefits | Articles 6(1)(b), (c) and, where applicable, (e). |
| Safeguarding and suitability | Identity, employment history, allegations, DBS, barred list, and professional checks | Articles 6(1)(c), (d) and (e); Article 9(2)(g); Article 10 and applicable Schedule 1 conditions. |
| Health, safety, and adjustments | Health, sickness, occupational health, accident, and adjustment information | Articles 6(1)(c), (d) and (e); Articles 9(2)(b), (h) or (i), with applicable DPA 2018 conditions. |
| Equality monitoring | Protected-characteristic information used for equality monitoring | Articles 6(1)(c) or (e); Article 9(2)(g) and the applicable substantial-public-interest condition. |
| Performance and employee relations | Appraisal, capability, grievance, disciplinary, whistleblowing, and investigation records | Articles 6(1)(b), (c), (e) and, where appropriate, (f); Articles 9(2)(b), (f) or (g) if needed. |
| Security, ICT, and fraud prevention | CCTV, access, devices, logs, accounts, and security events | Articles 6(1)(c), (e) and, where appropriate, (f). Special category or criminal data conditions identified if captured and necessary. |
| Workforce Census and sector planning | Identity, role, contract, qualification, absence, and other required workforce fields | Articles 6(1)(c) and (e); Article 9(2)(g) where special category data is required. |
| Optional publicity and communications | Photographs, biographies, and optional promotional material | Article 6(1)(a) where consent is appropriate, or another identified basis for necessary official communications. |

## Schedule 3: Recipients and DfE workforce information

The Trust may share information, where necessary and lawful, with payroll, pension, benefit, occupational health, recruitment, training, legal, insurance, audit, ICT and records providers; the Department for Education; HM Revenue & Customs; local authorities; safeguarding partners; the Disclosure and Barring Service; Teaching Regulation Agency and other professional bodies; trade unions or representatives where authorised or required; courts, tribunals, police and regulators; and prospective employers where a reference is properly requested.

The Trust supplies required school workforce information to the Department for Education. The Department uses education workforce information for its statutory education functions, including protecting learners, workforce analysis, funding, research, and statistics, and publishes separate privacy information. The Department is a separate controller for the information it receives.